

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Civil Action. 24-478-NBF

U LOCK INC.,

(Arising out of Appeal from Bankruptcy
Case No. 22-20823-GLT)

Debtor,

Shanni Snyder,

Appellant,

v.

Christine Biros,

Appellee.

MOTION TO WITHDRAW APPEARANCE

AND NOW, come John P. Lacher and David L. Fuchs, Counsel for Shanni Snyder, the Appellant herein, and file the following Motion to Withdraw Appearance:

1. On March 21, 2024, Shanni Snyder, by and through her Counsel, filed a Notice of Appeal herein seeking this Honorable Court's review of a Bankruptcy Court Order which disallowed Shanni Snyder's Claim in the U LOCK, Inc. Chapter 7 Case.
2. After briefing, this Honorable Court on November 8, 2024 entered a Memorandum Opinion and Order affirming the decision of the Bankruptcy Court.
3. The time to appeal said affirmance expires on November 12, 2024.
4. On November 8, 2024, Shanni Snyder filed a pro se Motion seeking reconsideration of the affirmance.
5. This Honorable Court immediately issued an Order striking said pro se Motion and denying same as well.
6. Both prior to, and since, this filing of the pro se Motion for Reconsideration, Counsel for

Shanni Snyder has attempted to converse with Shanni Snyder regarding this case. Counsel has left phone messages, sent texts and sent emails requesting that Shanni Snyder call to discuss the instant case.

7. Other than an email sent just prior to the filing of the pro se reconsideration motion (which Motion Counsel declined to file), Shanni Snyder has not responded to Counsel.

8. Although Counsel has indicated an urgent need to speak with Shanni Snyder, she has not responded.

9. In light of the foregoing, irreconcilable differences and a total breakdown in communications has arisen between Shanni Snyder and her Counsel. As such, Counsel to Shanni Snyder can no longer provide her with effective representation.

10. Ms. Snyder has been informed via email of Counsel's intention to withdraw and the time frame for the filing of a Notice of Appeal and, still, she has not responded.

11. Counsel believes that a withdrawal of their appearances will allow Ms. Snyder to appeal this Honorable Court's affirmance Order pro se if she so desires. As of now, Counsel is unable to speak with Ms. Snyder and thus cannot represent her on appeal if she intends to take one.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order withdrawing the appearances of John P. Lacher and David L. Fuchs as Counsel for Shanni Snyder herein.

Respectfully Submitted,

Date: November 12, 2024

/s/ David L. Fuchs

DAVID L. FUCHS

PA I.D. #205694

Fuchs Law Office, LLC

554 Washington Ave, First Floor

Carnegie, PA 15106

(412) 223-5404 (phone)

(412) 223-5406 (facsimile)

dfuchs@fuchslawoffice.com

AND

/s/ John P. Lacher

JOHN P. LACHER

PA I.D.#62297

The Lynch Law Group

501 Smith Drive, Suite 3

Cranberry Township, PA 16066

(724) 776-8000

(724) 776-8001

jlacher@lynchlaw-group.com

Counsel for Appellant, Shanni Snyder

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CERTIFICATE OF SERVICE

David Fuchs certifies, that on the 12th day of November, 2024, a true and correct copy of the foregoing **MOTION TO WITHDRAW APPEARANCE** was served upon the following (via electronic service):

Sarah E. Wenrich
Bernstein-Burkley, P.C.
707 Grant Street, Suite 2200,
Gulf Tower
Pittsburgh, PA 15219
412-456-8163
Email:
swenrich@bernsteinlaw.com

Stuart C. Gaul, Jr.
Bernstein-Burkley, P.C.
601 Grant Street
Ste 9th Floor
Pittsburgh, PA 15219
412-456-8139
Fax: 412-456-8135
Email:
sgaul@bernsteinlaw.com

Lara Shipkovitz Martin
Bernstein-Burkley, P.C.
601 Grant Street
Ste 9th Floor
Pittsburgh, PA 15219
412-456-8102
Fax: 412-456-8135
Email:
Lmartin@bernsteinlaw.com

Date: November 12, 2024

/s/ John P. Lacher
JOHN P. LACHER
PA I.D.#62297
The Lynch Law Group
501 Smith Drive, Suite 3
Cranberry Township, PA 16066
(724) 776-8000
(724) 776-8001
jlacher@lynchlaw-group.com